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July 16, 2004

By Hand

Lawrence H. Norton, Esq.  
General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: Charles Kushner and Associated Entities

Dar Mr. Norton:

Pursuant to the Commission's rules, 11 C.F.R. §103.3(b)(2), our client, DNC Services Corporation/Democratic National Committee ("DNC") has reviewed certain contributions from Charles Kushner and partnerships associated with him as referenced in MUR 5279, General Counsel's Report #4 and Conciliation Agreement. The DNC has determined that \$124,000 in contributions to the DNC's federal account made during the 1999-2000 election cycle, contributions which appeared entirely legal when received and deposited, were not lawfully made based on information developed in the Commission's investigation in MUR 5279. The DNC is therefore disgorging this amount to the U.S. Treasury.

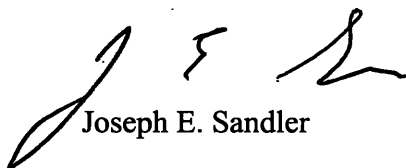
In addition, the DNC has determined that it would be appropriate to disgorge an additional \$25,000 representing the contributions made by Charles Kushner personally to the DNC during the current (2003-04) election cycle.

Accordingly, a check for \$149,000 is enclosed.

If you or your staff have any questions or need further information concerning the above, please contact us.

Thank you for your time and attention to this matter.

Sincerely yours,



Joseph E. Sandler

RECEIVED  
FEC MAIL  
OPERATIONS CENTER  
JUL 16 P 5 04

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 16, 2004

**TWO WAY MEMORANDUM**

TO: OGC Docket  
FROM: Gwen Holmes *GH*  
Accounting Technician  
SUBJECT: Account Determination for Funds Received

We recently received a check from **Democractic National Committee** check number **10982**, dated, **July 16, 2004**, for the amount of **\$149,000.00**. A copy of the check and any correspondence are being forwarded. Please indicate below which account the funds should be deposited and give the MUR/Case number and name associated with the deposit.

=====

TO: Gwen Holmes  
Accounting Technician  
FROM: OGC Docket  
SUBJECT: Disposition of Funds Received

In reference to the above check in the amount of \$149,000.00,  
the MUR/Case number is 5279 and in the name of  
Democratic National Committee. Place  
this deposit in the account indicated below:

☐ Budget Clearing Account (OGC), 95F3875.16

☐ Civil Penalties Account, 95-1099.160

☒ Other: Disgorgement

*Jim C. Stevens*  
\_\_\_\_\_  
Signature

July 19, 2004  
\_\_\_\_\_  
Date